



**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Modernizing the E-rate)	WC Docket No. 13-184
Program for Schools and Libraries)	

CRW Consulting has been in business for over 13 years as an E-rate consultant. Currently, CRW client base includes over 225 districts in 7 states. We offer the comments below as a reflection of our positions on the proposed E-rate NPRM.

TABLE OF PROPOSED CHANGES

ITEM	PARAGRAPH #	DOES CRW SUPPORT PROPOSED CHANGE?	NOTES
Continue to amortize WAN construction costs over \$500K over a three year period	73	N/A	If the FCC does not phase out this requirement, they should pre-commit multiple year funding (three years) for that funding request.
Increased support for fiber deployment	74	YES	We believe this is the #1 reason for lack of fiber deployment for our customers – the shortfall in funding for the one-time charges to install the fiber.
Allow applicants to purchase WANs	80	NO	CRW is concerned that this would cause a huge increase in demand for funding
Funding for bandwidth capped by a per Mb amount	89	NO	Prices vary significantly based upon geographic area
Eliminate eligibility for some calling features	95	NO	Cost savings does not justify the administrative burden; applicants would have to review all phone bills for obscure charges
Eliminate eligibility for	97	YES – web hosting	Web hosting has gone WAY

email and web hosting		NO - email	beyond the original intent of funding bandwidth and hard drive space.
Eliminate eligibility for Non-Instructional buildings	100	NO	Would greatly complicate the application process, not justified by the relatively small cost savings. Additionally the current USAC category of buildings "NIF with classrooms" could make this a nightmare.
Eliminate eligibility for Basic Maintenance Services	101	YES	In our experience, prices for maintenance are much higher for E-rate supported maintenance and generally are funded so late as to be of little use to the Applicant.
Eliminate eligibility for data plans used with cell phones or tablets/laptops	102	YES	Would stop future abuse from Applicants requesting data plans for student devices.
Phase out support for traditional voice services	105-110	NO	Forcing applicants to USF supported VoIP services quickly could be too much too quickly for small applicants, even over a 5 year period. Some small applicants just don't have the technical ability to do VoIP, some are so overworked they can't manage it, and all of their jobs depend on having a functional voice and data network.
Decrease overall discount rate to 70% or 80%	117-125	YES	STRONGLY SUPPORT Increasing the share that the poorest applicants have to pay will foster more cost-effective decisions.
Use district-wide or LEA discounts, not discounts or applications by individual school	126-132	N/A	
Eliminate discount matrix	149	NO	CRW believes rural and poor schools should continue to receive more support from the program
Simply competitive bidding procedures	159	YES	Require applicants to go through competitive bidding process once every three years per on a tariffed or month-to-month FRNs. Not all Service Providers offer contracts. If the applicant changes service levels (adds

			bandwidth) or wants a new provider they would be required to re-bid that service. <u>It does not make sense to force applicants to bid out their services every year when they have no intention of changing providers. Procurement cycles set 12 months apart is too frequent for most applicants (imagine if USAC had to re-bid their phone services EVERY year).</u> Every time a competitive bidding process is undertaken a large amount of documents are generated (call logs, meeting notes, Q&A from vendors, copies of RFPs, bid evaluation sheets, etc).
Increase funding for the program	172-176	YES	Demand has outpaced available funding for most of the application years. The FCC should set the size of the fund to more closely match demand size, and should index the fund to inflation back to 1998. CRW believes the ISTE goal of \$5 billion is the appropriate funding level.
Leverage consortium applications and bulk-buying opportunities	17-185	N/A	Laudable goal, but in reality this means two applications for each consortium member. Most applicants are already over-stretched. Without concrete suggestions as to what a "consortium friendly application process is" CRW cannot support this suggestion.
Require applicants to use state master contracts	186	NO	USAC should do everything they can to encourage state master contracts, but not require them. A specific list of those contracts by state and by service provided would be helpful. It would also be helpful if USAC would make using a SMC easier (get rid of the rules that require state replacement contracts and allow the applicant to use the end of the funding year as the contract expiration date). Don't require mini-bid processes and if the state agency didn't use

			a 470 to bid out that SMC, allow the applicant to apply for it without a 470#.
USAC posts prices and bids from service providers	194-195	N/A	If this is adopted, it should be done generically so that the applicant could use those lists as a double-check against bids received. If adopted, the FCC should also clarify bidding rules that the applicant is allowed to solicit more bids after the deadline if the prices from the bids received differ significantly from the list posted by the FCC/USAC.
Establish an office of Cost Effectiveness for applicants to use during bidding process	198	UNSURE	Laudable goal, not sure it would work well in practice. Unsure if the potential cost savings would justify the additional expenses
Require multiple bids	204	NO	The competitive bidding process is already too complicated. Applicants are too overworked, starting a requirement that they have to track down potential providers, contact them and get them to submit a bid during the filing window while time is short and stress is high is a bad idea.
Require applicants to certify they have reviewed state master contracts	205	NO	Potentially could mean HOURS if not DAYS of additional work on the part of the applicant. Adding additional requirements during the filing window is a bad idea.
Exempt applicants from competitive bidding rules if they follow state and local procedures	206	YES	
Exempt applicants from competitive bidding rules if FRN is below a certain dollar amount	206	YES	Suggested FRN limit = \$25,000.
Allow contracts to be signed after 471 is submitted	208	YES	Fantastic idea. Most applicants sign contracts now in violation of their state competitive bidding rules which require them to sign contracts during the same fiscal year in which those services are to be provided.
LCP - Additional burdens for applicants that receive	209	NO	Do not punish the applicant; do not conduct additional reviews of

only one bid			the application, instead go directly to the service provider without contacting the applicant at all.
Foster efficient funding by ensuring applicants don't choose "expensive" solutions	212	NO	Applicants may choose to select services that USAC thinks are "expensive" for a variety of reasons. They may have a first-year tech director and the superintendent decided to purchase a more "expensive" solution that is easier to administer. Schools should have some flexibility in the services they choose.
Pilot program for E-rate 2.0	221	NO	Bad time to start a pilot program, wait until the dust settles from E-rate 2.0 before starting a pilot program. Too many changes too quickly...
Require electronic filing	221	YES	All forms should be available on-line
Applicant portal	229	YES	USAC should upgrade entire web-based system. USAC should require that bids be submitted through the system/470 form. USAC would have copies of all bids. The applicant portal should contain all correspondence from USAC (including PIA questions). Such an applicant portal would reduce the need for consultants and allow applicants to view their "E-rate history" quickly and efficiently.
Deadlines for USAC funding commitments	233	NO	A hard and fast deadline for FCDLs on all applications does not make sense. USAC should never issue an FCDL if it has not properly reviewed the funding requests. USAC should have goals for average timelines of application processing.
Ways to make sure "problem" funding requests don't hold up other funding requests	206	YES	USAC used to issue FCDL for these situations with those "problem" FRNs listed as "As Yet Unfunded." CRW has no idea why they stopped this productive practice; we feel USAC should start doing this again.

Decrease required PIA response time	237	NO	Applicants are already overworked. If the FCC adopts this standard more applicants will need consultants.
Make PK facilities eligible nationwide	238	NO	Unless a budget cap system is instituted, those PK entities that are admitted will drive up demand as they are usually high discount sites.
Multi-year funding for multi-year contracts	241	YES	Great idea, but don't limit applicants to a 3 year term. USAC could pre-commit funds for up to three years at a time, but don't limit the applicant to signing a contract with a max term of 3 years.
Combine 486 certifications to the 471 form	247	YES	Late filing the 486 is one of the top reasons CRW gains new customers year after year. If the FCC wants to reduce the use of consultants, it should get rid of the 486 altogether or eliminate funding reductions for late filing of the form.
Reduce the amount of unused funds	256	YES	Get rid of the new SPIN change rules. Currently if an applicant is moving from one service provider to another, the applicant usually will apply for the full 12 months for the old provider, and a full 12 months for the new provider, because the applicant doesn't know when they will be funded or when the new provider can turn up service.
Deadline (or requirement) for applicants to review expenditures during the funding year	258	NO	Administrative nightmare for an already overworked applicant community.
BEAR checks directly to applicant	261	YES	This idea is overdue and should be implemented immediately
CIPA as it applies to BYOD and devices that leave campus	271-275	YES	Clarification would be appreciated. The FCC should administer a policy that if there is no funding to recover, there is no FCC CIPA requirement. For example, off site internet access is not eligible. Since that service is not eligible, the FCC should not care if that device is CIPA

			compliant off campus.
50% response rate for survey	289	YES – keep as is	CRW believes the 50% response rate is reasonable.
Change document retention period to 10 year term	295	NO	10 years is entirely too long to require an applicant to keep documentation. USAC and its sub-contractors should be limited to a 5 year term to audit the program. 10 years is not consistent with other federal agencies (IRS) and a ten year requirement would push a bunch of applicants to consultants when they get audited 8-10 years later.
Submit competitive bidding documents with 471	298	NO	Bad idea – will complicate application process during the already tight filing window and will increase processing time by USAC greatly.
Require only “corporate officers” sign applicant forms	306	NO	Will require the re-issuance of PINs for employees that have never signed the form before, adds another requirement during a tight filing window. Also is not good guidance – applicants will now have to know what constitutes a “corporate officer” at their district and who fits into that definition. <u>No assurance that the additional requirements will lead to increased knowledge of the certifications (especially if one person fills out the application and another signs it).</u> IF the FCC adds this requirement and USAC discovers the signatory is not of a “corporate officer” status, then USAC should provide the opportunity to the applicant, after the application has been submitted, to have a different, “corporate officer” employee sign that form. Having the wrong person sign the application should not be a reason for outright denial.